Statutory DeclarationState of South Australia

Oaths Act 1936

	[name] [occupation]
•••	in the State of South Australia,
so	olemnly and sincerely declare that:
	I have / have not* entered into a deed of release with the defendants or any one of them, in the Supreme Couproceedings 2017/279308 or any of their related entities in respect of a claim for damages for brea augmentation surgery performed at any of the TCI premises located at Gold Coast, Bondi Junction or Parramati (TCI BAS). [*Strike out whichever does not apply to you.]
	I have / have not* already received an amount of compensation in full and final satisfaction of a claim for damages in connection with my TCI BAS.
	Update about my injuries, disabilities and treatment
	I have / have not* suffered INJURIES AND COMPLICATIONS as a result of undergoing TCI BAS. My injurie are set out in ANNEXURE A. [Complete Annexure A: Injuries and complications.]
	An up-to-date summary of my injuries and disabilities, is as follows:
	Past treatment
	I have / have not* undergone REVISION SURGERIES or PROCEDURES in the past to address injurie sustained as a result of my TCI BAS. [Explain.]
	Future treatment
	I do / do not* require REVISION SURGERY or OTHER TREATMENT in the future because of injuries sustained as a result of my TCI BAS. [Explain.]

Medication and other treatment have / have not* required MEDICATION in the past, to treat my injuries and disabilities (includin sychiatric injuries) suffered as a result of my TCI BAS, not including any pain medication required during standard two week post operative period. [Explain, including time periods medication required, and what purrently still being taken.] have / have not* undergone other NON-SURGICAL TREATMENT in the past, in respect of my injuries disabilities suffered as a result of my TCI BAS [such as chemotherapy, consultations with a pain manage specialist, physiotherapy, psychological treatment etc]. Explain. For example, if you have seen your GP or specialist about pain, disfigurement, rupture, see contracture, ALCL, or any other physical injury or complication you have experienced, set out the treatment, including the name, specialisation and address of the doctors you had treatment with.] am / am not* STILL BEING TREATED / REQUIRE REGULAR MEDICATION in respect of my injuries itsabilities (including any psychiatric injuries) suffered as a result of my TCI BAS. [If yes, complete: Ann B. Types of treatment includes chemotherapy, consultations with a pain management specialist, physiothes sychological treatment, pain medication, etc.]
asychiatric injuries) suffered as a result of my TCI BAS, not including any pain medication required during standard two week post operative period. [Explain, including time periods medication required, and who currently still being taken.] have / have not* undergone other NON-SURGICAL TREATMENT in the past, in respect of my injuried disabilities suffered as a result of my TCI BAS [such as chemotherapy, consultations with a pain manage specialist, physiotherapy, psychological treatment etc]. Explain. For example, if you have seen your GP or specialist about pain, disfigurement, rupture, secontracture, ALCL, or any other physical injury or complication you have experienced, set out the treatment, including the name, specialisation and address of the doctors you had treatment with.] am / am not* STILL BEING TREATED / REQUIRE REGULAR MEDICATION in respect of my injuries disabilities (including any psychiatric injuries) suffered as a result of my TCI BAS. [If yes, complete: Annows and the pain management specialist, physiothes).
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disabilities (including any psychiatric injuries) suffered as a result of my TCI BAS. [<i>If yes, complete: Ann</i> B. Types of treatment includes chemotherapy, consultations with a pain management specialist, physiother
Disabilities or functional effects
I have / have not* suffered DISABILITIES OR FUNCTIONAL EFFECTS, as a result of the injuries I suffrom my TCI BAS, not including the normal two-week post-operative rehabilitation period. [Explain the your ability to function on a day-to-day basis and perform your activities of daily life has been affected, inc your ability to lead a normal life, if relevant.] [If yes, complete: Annexure C: Activities of Daily Living.]

Effects to my life

 Med	icare. [*Select whichever applies to you.]	 ••••
Med (a)	icare. [*Select whichever applies to you.] I HAVE used Medicare to pay for expenses to treat injuries related to my TCI BAS, such as imaging fees, specialist fees, or revision surgery fees.	······································
	I HAVE used Medicare to pay for expenses to treat injuries related to my TCI BAS, such as	
	I HAVE used Medicare to pay for expenses to treat injuries related to my TCI BAS, such as imaging fees, specialist fees, or revision surgery fees. I understand that I may need to repay Medicare the amounts paid by Medicare to treat my TCI	
	I HAVE used Medicare to pay for expenses to treat injuries related to my TCI BAS, such as imaging fees, specialist fees, or revision surgery fees. I understand that I may need to repay Medicare the amounts paid by Medicare to treat my TCI BAS injuries, if I become entitled to receive compensation over \$5,000 in respect of my injuries.	

NDIS	DIS or other Government funding or supports received in connection with my TCI BAS.							
(a)	I HAVE received treatment benefits, funding or support in connection with the injuries sustained from my TCI BAS, from:							
	National Disability Insurance Scheme (NDIS).							
	Other State or Commonwealth Government organisation [list]:							
	I understand that I may have obligations to repay NDIS or other State or Commonwealth Government body for funding I may have received towards my TCI BAS treatment expenses, if I receive a compensation amount for injuries.							
	OR							
	I HAVE NOT received any NDIS, State or Commonwealth benefits, funding or support in							
(b)	connection with my TCI BAS injuries.							
	te health insurance. [*Select whichever applies to you.]							
Priva	te health insurance. [*Select whichever applies to you.] I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO							
Priva	te health insurance. [*Select whichever applies to you.] I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO PRESENT, a member of a private health insurance fund for private health coverage:							
Priva	I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO PRESENT, a member of a private health insurance fund for private health coverage: Name of private health fund:							
Priva	I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO PRESENT, a member of a private health insurance fund for private health coverage: Name of private health fund: Member number:							
Priva	I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO PRESENT, a member of a private health insurance fund for private health coverage: Name of private health fund: Member number: If yes: I HAVE / HAVE NOT* received any benefits or funding, for any treatment in connection with my							
Priva	I AM CURRENTLY, OR HAVE BEEN AT ANY TIME FROM THE DATE OF MY TCI BAS, TO PRESENT, a member of a private health insurance fund for private health coverage: Name of private health fund: Member number: If yes: I HAVE / HAVE NOT* received any benefits or funding, for any treatment in connection with my TCI BAS injuries, from my private health insurer. [Strike out whichever does not apply.] I may have contractual obligations to repay my private health fund, for benefits I received towards							

A Justice of the Peace/Commissioner for Declarations/NotaryPublic/Solicitor/Barrister

- 15. I understand that the updated information provided in this statutory declaration and the attached annexures, supersedes the information that I have previously provided Turner Freeman Lawyers including by way of my (registration) questionnaire.
- 16. I understand that I have an obligation to act honestly and the information I have given in this statutory declaration including the information I have given at Annexures A, B and C, is true and correct.

And I make this solemn declar the provisions of the <i>Oaths Ad</i>	ration conscientiously believing the same to be true and by ct 1936.	virtue of
Declared at	in the State of South Australia thisday of	202
	Signature of person making this declaration	
Before me	[to be signed in front of an authorised witness]	
Signature of authorised witness		

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ANNEXURE A

Injuries and complications suffered as a result of undergoing my TCI BAS

Instructions

- Provide details of any physical or psychological injuries you have suffered, below.
- Being unhappy with the staff or service provided to you by TCI such as being rushed out after the surgery, is not a "complication" or "injury".
- Pain, discomfort, swelling or other issues normally experienced in the two-week post-operative recovery period, are not "complications" or "injuries".

CURRENT SEVERITY OF SYMPTOMS

If you were to spend the rest of your life with your symptoms just the way they are now, how would you feel about that?

0	1	2	3	4	5	6	7	8	9	10
Pleased			Indiffere	∩t			errible			

Injuries / complications.	Reference guide / general explanation of complications	Suffered as a result my initial TCI BAS. Yes/No	Details, and whether injury is still suffered.
None.	I have not suffered any injuries or disabilities.	Only tick if you have not suffered any injuries as a result of your TCI BAS.	Not applicable.
Pain.	For example, breast, back, neck, chest, arm/s, generalised pain.	Yes □ No □	Still suffered? Yes □ No □ Brief details: Location of pain: How often do you experience pain on a weekly basis: Every day: □ Some days: □ Occasionally: □ Other: □

			week out of 10, 10 being highest severity: / 10
Discomfort.	General discomfort.	Yes □	Left breast: □ Right breast: □
		No □	Still suffered? Yes □ No □
			Brief details:
			Discomfort Rating: Rate discomfort at its worst, in the last week out of 10, 10 being highest severity:
			/ 10
Psychiatric effects.	Effects to mental health such as anxiety, distress,	Yes □	Still suffered? Yes □ No □
	stress, PTSD, depression.	No 🗵	Brief details:
	·		
			If you are suffering with a psychiatric/psychological condition, had you ever suffered these symptoms before you had breast implants? If yes, for what period of time?
			If you had previously suffered with a psychological/psychiatric condition, had you ever required treatment before the implants? If so, what treatment did you have? (eg. seeing your GP, psychologist, psychiatrist, and/or being prescribed medication) and for how long?
			If you had previously suffered with a psychological/psychiatric condition, for which you have required treatment before you had

			breast implants, provide the names, speciality and addresses of the doctor/s you had treatment with:
Poor aesthetic outcome.	Unsatisfactory appearance of breasts post-surgery and/or did not result in your desired outcome.	Yes □ No □	Still suffered? Yes No Brief details. If you are unhappy about your aesthetic outcome, explain what it is you are unhappy about:
Mal-positioning.	Implants placed too high, too low, too far laterally (to the side), uneven placement. May cause double bubble deformity, if positioned too low, or the implant drops below the inframammary fold, or waterfall deformity if sitting too high.	Yes □ No □	Left breast: □ Right breast: □ Still suffered? Yes □ No □ Brief details:
Double Bubble.	Distinct bulges, or bubbles, are visible in the breast, typically one over the other. May occur, for example, if the implant is positioned too low. Per Muscle Braset fold (pre-purgery) causing distinct fold (pre-purgery) causing distinct fold (post surgery)	Yes □ No □	Left breast: Right breast: Still suffered? Yes No Brief details:
Waterfall deformity (snoopy nose, or snoopy dog deformity).	Sagging appearance where the breast tissue seems to fall downwards and flow down over the implant, including with a	Yes □ No □	Left breast: □ Right breast: □ Still suffered? Yes □ No □ Brief details:

	downward facing or low nipple.		
	25		
	May be due to implant		
	placement too high, unaddressed pre-		
	existing ptosis (sagging), performing a breast augmentation alone		
	without a breast lift		
	(mastopexy) if indicated.		
	May also be an inherent long-term complication		
	of breast augmentation surgery.		
Rupture.	Intracapsular rupture:	Yes □	Left implant: □ Right implant: □
	where the implant ruptures and the fluid stays within the fibrous	No □	Still suffered? Yes □ No □
	'capsule' formed by the body around the implant.		Brief details:
	May eventually progress into an extracapsular		
	rupture.		
	Extracapsular rupture: where the implant fluid		
	leaks through the fibrous capsule the body has		
	formed around the implant, spreading into		
	the breast tissue and surrounding muscle.		
Haemorrhage.	_	V	Laft baseate C
паетоппауе.	during or after the	Yes □	Left breast: ☐ Right breast: ☐
	surgery.	No □	Brief details:
Haematoma.	Internal collection of blood beneath the skin.	Yes □	Left breast: □ Right breast: □
	Can make one breast	No □	Details:
	appear larger than the other and create a bruise		

Haematoma may place you at higher risk of	
suffering capsular contracture.	
Seroma. Accumulation of clear Yes Left breast: Right breast: Right breast:	
need to be drained. No □ Still suffered? Yes □ No □	
Brief details:	
Infection. Infection at the incision Yes Location of infection:	
around the implant. No 🗆	
Can complicate wound healing, cause pain and Still suffered? Yes □ No □	
affect scarring. Brief details:	
Excessive Thickened or hardened Yes scarring. Scars, excessively long Left breast: Right breast: Excessive Scars, excessively long	
or wide scars, unsightly or uneven stars etc.	
Can be exacerbated by normal scarring as Brief details:	
poor incision/technique, may be expected requirement for multiple from undergoing	
revision surgeries, the initial TCI BAS.	
Wound Partial or total Yes □ Left breast: □ Right breast: □ dehiscence. breakdown of wound,	
failure of the wound to close properly.	
Brief details:	

Capsular contracture.	The body naturally forms a "capsule" of scar tissue around the implants. Sometimes the capsule can become unusually hardened and contract around the implant. This is called capsular contracture. This can cause pain and also lead to other issues such as distorted looking, tight, mishappen breasts, poor aesthetic outcome, variations in size and shape (asymmetry), deformity	Yes □ No □	Left breast: Right breast: Still suffered? Yes No Brief details:
	and shifts in the position of the implant.		
Breast hardness.	Unusual firmness of the breast. Can be a sign of	Yes □ No □	Left breast: ☐ Right breast: ☐ Still suffered? Yes ☐ No ☐
	capsular contracture.		Brief details:
Local anaesthetic toxicity and/or complications	May occur when too much anaesthesia is given.	Yes □ No □	Still suffered? Yes □ No □
such as:			Brief details:
cardiac arrest;			
• seizures.			
Pneumothorax.	Air trapped between the	Yes □	Still suffered? Yes □ No □
	lung and chest wall.	No □	Brief details:
Breast implant illness (BII).	May be a wide range of symptoms such as: joint	Yes □	Still suffered? Yes □ No □
	and muscle pain, hair loss, chronic fatigue,	No □	Brief details:

	memory loss, rashes, gastrointestinal problems, headaches, anxiety, depression and concentration problems.		
Inadequate	The excavation of tissue	Yes □	Left breast: ☐ Right breast: ☐
pocket dissection.	and muscle to create the pocket where the implants are placed, is	No □	Still suffered? Yes □ No □
	inadequate. The pocket may be too big, too small, or mal-positioned.		Brief details:
	May result in implant		
	animation (implant moves around if pocket too large), implant		
	relocating laterally to the side, implant sitting too		
	high, too low or asymmetrically (unevenly).		
Swelling / fluid	Accumulation of fluid in	Yes □	Left breast: □ Right breast: □
build-up.	the breast area post- surgery or on a long-term	No □	Still suffered? Yes □ No □
	basis.		Brief details:
Asymmetry.	Uneven size, shape and/or position of	Yes □	Left breast: □ Right breast: □
	implants.	No □	Still suffered? Yes □ No □
	Can be related to implant malposition or capsular		Brief details:
	contracture, for example.		
Nerve damage.	Surgical error or poor technique may result in	Yes □	Left breast: □ Right breast: □
	damage to nerves.	No □	Still suffered? Yes □ No □
	Can cause pain and numbness.		Brief details:

Numbness.	Loss of sensation.	Yes □	Left breast: ☐ Right breast: ☐
		No 🗆	Still suffered? Yes □ No □
			Brief details:
Headaches.	Self-explanatory.	Yes □	Still suffered? Yes □ No □
		No □	Brief details:
Sensitive nipples (or	Increased sensitivity or discomfort in the nipple	Yes □	Left breast: ☐ Right breast: ☐
hyperesthesia).	area.	No □	Still suffered? Yes □ No □
			Brief details:
Rippling.	Visible folds or waves on the skin, from the implant.	Yes □	Left breast: □ Right breast: □
		No □	Still suffered? Yes □ No □
			Brief details:
Symmastia.	The breasts touch or sit too close together at the centre of the chest, sometimes called 'uniboob'. Can be caused by implant displacement,	Yes □	Still suffered? Yes □ No □
		No □	Brief details:
	inadequate pocket dissection, incorrect		
	placement.		

Raad & Ors v The Cosmetic Institute & Ors, NSW Supreme Court Class Action - Settlement Distribution Scheme

Breast implant associated	A rare type of cancer associated with textured	Yes □	Left breast: □ Right breast: □
anaplastic large- cell lymphoma	implants.	No □	Still suffered? Yes □ No □
(ALCL).	Allergan textured implants had a higher	you have been diagnosed with	Brief details:
	risk of developing BIA- ALCL than others on the		
	market.		
I understand that I h	ave an obligation to act hon	estly and am satisfied	I that the information I have given in this statutory
declaration includin	g this Annexure A , is true a	and correct (clause 1	1.2 of the Settlement Distribution Scheme).
Signature:			
Name:			
Date:			

ANNEXURE B

My ongoing treatment including medication (if any)

Instructions

Provide details of any ongoing treatment including medication, below.			
A general description about my ongoing treatment, follows:			
	•••••	•	
		•	
ONGOING TREATMENT			
Pain Medication			
Are you <i>currently</i> taking any pain medication as a result of your breast augmentation surgery with		Yes	
TCI?		No	
If so, for how many years or months have you been taking the medication?			
What medication do you take? What dosage do you take?			
Did you have a pre-existing condition that required you to take pain medication prior to your breast		Yes	
augmentation surgery with TCI?		No	
If yes, what medication did you take and what dosage?			
Market and the second address of the destaurch assessment the destaurch assessment to the second address of th			
If yes, please provide the name and address of the doctor who prescribed the medication.			

Other Medications

Are you <i>currently</i> taking any medication to treat a psychological condition, infection or other complication you have suffered as a result of your breast augmentation surgery with TCI?	Yes
If so, for how many years or months have you been taking medication?	No
What medication do you take? What dosage do you take?	
Who prescribed the medication? Please provide the name & address of the doctor/s who prescribed it.	
Did you have a pre-existing condition that required you to take this other medication prior to your breast augmentation surgery with TCI?	Yes No
If yes, what medication did you take, and what dosage?	110
If yes, please provide the name and address of the doctor who prescribed the medication.	
Other Treatment	
Do you <i>currently</i> receive any other type of treatment as a result of your breast augmentation surgery with TCI. For example, chemotherapy, consultations with a pain management specialist, physiotherapy, psychological treatment etc?	Yes No
If yes, what type of treatment?	
How frequently do you receive this treatment?	
Who provides this treatment? Please provide the name and address of the doctor/s who provides it.	
I understand that I have an obligation to act honestly and am satisfied that the information I have given in the declaration including this Annexure B , is true and correct (clause 11.2 of the Settlement Distribution Sch	-
Signature:	
Name:	
Date:	

ANNEXURE C

Activities of daily living

Instructions

- > Some women find that complications from breast augmentation surgery, affect their activities of daily living.
- For each question, check the response that best describes how much your activities have been affected by the complications you have suffered. Please tick the box that best describes the impact of the complications over the last three months. Please make sure you mark an answer in all three columns for each question.

	How do symptoms or conditions affect your:	
(a)	Ability to do household chores (cooking, laundry, house cleaning)?	Not at all
		Somewhat
		Moderately
		Quite a bit
(b)	Ability to do physical activities such as sports, hobbies, recreational activities, walking, swimming, or other exercise?	Not at all
		Somewhat
		Moderately
		Quite a bit
(c)	Ability to travel by car or bus for a distance greater than 30 minutes away from home?	Not at all
		Somewhat
		Moderately
		Quite a bit
(d)	Participating in social activities outside your home?	Not at all
		Somewhat
		Moderately
		Quite a bit
(e)	Emotional health (nervousness, depression, etc.)?	Not at all
		Somewhat
		Moderately
		Quite a bit

Raad & Ors v The Cosmetic Institute & Ors, NSW Supreme Court Class Action - Settlement Distribution Scheme

I understand that I have an ob-	oligation to act honestly and am satisfied that the information I have given in this statutory
declaration including this An	nexure C, is true and correct (clause 11.2 of the Settlement Distribution Scheme).
Signature:	
Name:	
Date:	

For instructions on who can witness your statutory declaration, visit the Government of SA, Attorney General's Department:

https://www.agd.sa.gov.au/services-support/JP-witnesses/authorised-witnesses